May 31, 2019

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: GN Dkt. No. 18-122

Dear Ms. Dortch:

Last year, the Commission took several actions to speed the deployment of 5G wireless service, including removing impediments put in place by local governments to the deployment of wireless infrastructure. Removing impediments to 5G infrastructure deployment is essential since the massive transition to 5G now underway requires installation of as many as one million new wireless small cell facilities at roughly 100 times more locations than 4G and 3G cell site installations of today. Our companies have a major interest in 5G because each of us is involved with the wireless industry by making wireless network infrastructure or equipment used to deploy that infrastructure, or by erecting towers on which wireless equipment is placed. More important than our parochial business interest, however, is the fact that the services provided by 5G networks will facilitate U.S. world leadership in 5G and will benefit consumers greatly since 5G networks produce transmission speeds up to 100 times faster than 4G networks and provide far greater bandwidth than 4G networks along with lower latency and power consumption. These benefits, in turn, will spawn technological innovation such as a new Internet of Things market connecting to the Internet numerous types of healthcare devices, sensors, home automation equipment, wireless utility meters, and autonomous vehicles.

Having taken important steps last year to get 5G off the ground, we urge the Commission to take the next major step to speed 5G's growth by issuing an order within the next few months substantially expanding the amount of spectrum available for 5G service by authorizing a large chunk of the 500 MHz of spectrum between 3.7 and 4.2. GHz (the "C-Band") now used mostly by satellite operators to transmit video programming to ground stations for delivery to cable TV systems. C-Band spectrum is a sweet spot for 5G because of its ability to transmit high-capacity signals at great distance. China, arguably our country's primary competitor in the drive to promote 5G, already is in the process of allocating this spectrum band for use by 5G.

While there is broad agreement in the U.S. among interested parties about the desirability of using C-Band spectrum for 5G here, there are two competing plans for how best to accomplish this result. The first, put forward by the incumbent satellite carriers (the "C-Band

Alliance" or "CBA") would repurpose a large part of the C-Band in 18-36 months through private market-based transactions. Under this plan, the FCC would review and approve the agreements between the satellite operators and the parties purchasing the cleared spectrum to ensure, among other things, that satellite services currently using the band are protected from interference. The other proposal would have the FCC conduct an auction of part of the C-Band. Many analysts believe an auction would take much longer to complete than private transactions – a delay we need to avoid in the race to 5G.

In deciding which of these two approaches to adopt, the Commission should give preference to the approach that will most quickly repurpose C-Band spectrum for 5G and is best designed to protect satellite operations in the band. When this test is applied, we believe that the private negotiation approach suggested by CBA is preferable and should be adopted by the FCC.

Respectfully submitted,

Apex Towers
BTECH
Prysmian Communication Cables & Systems

cc: Hon. Ajit Pai, Chairman
Hon. Michael O'Rielly, Commissioner
Hon. Brendan Carr, Commissioner
Hon. Jessica Rosenworcel, Commissioner
Hon. Geoffrey Starks, Commissioner